

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CHRISTOPHER PAIGE, and  
MICHELE PAIGE,

Appellants,

vs.

LMF,  
MORGAN LEWIS, and  
JOHN GOODCHILD, ESQ.,

Appellees

Bk. Appeal

No. 3:17 - CV - 00023

**FILED  
SCRANTON**

JAN 18 2018

PER   
DEPUTY CLERK

CHRISTOPHER PAIGE, and  
MICHELE PAIGE,

Debtors/Defendants

vs.

LMF,  
MORGAN LEWIS, and  
JOHN GOODCHILD, ESQ.,

Plaintiff/Respondents

Chapter 7

Case No. 5:11-bk-05957-JJT

Adv. No. 12-ap-00067-JJT

**APPELLANTS' JOINT-PETITION FOR PERMISSION TO PROCEED  
WITH THEIR APPEAL TO THE COURT OF APPEALS FOR THE THIRD  
CIRCUIT WITHOUT PAYING FEES OR INCURRING THE COSTS OF  
REPRODUCING THE RECORD WITH INCORPORATED AFFIDAVIT  
AND MEMORANDUM OF LAW**

**COME NOW** the Appellants Christopher and Michele Paige, the Debtor-Defendants in the above-captioned bankruptcy appeal, to respectfully request permission to proceed with their appeal *in forma pauperis*.

In support of this application, we hereby affirm all of the following questions under penalty of perjury:

1. On January 31, 2017 (App.Dkt. #8), the District Court granted our similar application in our initial appeal from the Bankruptcy Court's decision; our financial circumstances have not changed materially.

2. We are not employed.

3. We hereby affirm that the information below relating to our ability to pay the fees and costs is true and correct:

(a) Name: Christopher Howard Paige & Michele Paige

(b) Address: 75 78 177th St.; Fresh Meadows, NY 11366

Employment: None.

Date of last employment: 8/8/2011. (We were self-employed.)

Salary or Wages per month: We were self-employed by a business that lost money.

(c) Other income within the past twelve (12) months:

(a) Business or profession: \$8000 in honoraria for temporary teaching assignments.

(b) Other Self-employment: None. (We have written several unsold novels.)

(c) Interest: None.

- (d) Dividends: None.
- (e) Unemployment compensation and/or supplemental benefits: None.
- (d) Support payments:
  - (a) Disability payments: None.
  - (b) Pension & annuities: None.
  - (c) Other: None
  - (d) Other contributions to household support: None
- (e) Contributions from children per month: None; our children are toddlers.
- (f) Contributions from parent per month: Michele's parents provide all of or support in-kind.
- (g) Other contributions per month: None
- (h) Property owned:
  - (a) Cash: None
  - (b) Checking account: None
  - (c) Public assistance/TANF: None
  - (d) Saving account: None
  - (e) Certificates of deposit: None
  - (f) Real estate (including home): None
  - (g) Retirement/401(k): @\$10,000 in a 401(k), which - by law - we cannot touch until I'm 65, twenty years from now.

- (h) Motor vehicle: 2012 Toyota Sienna with @130,000 miles and a secured loan far in excess of its value.
- (i) Stocks: None
- (j) Bonds: None
- (k) Other: Household furnishings of minimal value and a “chose in action” in our bankruptcy proceeding
- (i) Debts and obligations:
  - (a) Mortgage: None
  - (b) Rent: None
  - (c) Loans: Student loans in excess of \$120,000; these debts become due and payable upon the termination of our bankruptcy.
- (j) Persons dependents upon you for support:
  - (a) Children: George, Rose, and Mary-Noel Paige

4. Declaration: We declare under penalty of perjury that the above information is true, and we understand that a false statement may result in a dismissal of our appeal.

5. As demonstrated by our Appellate Brief, which we also file herewith, our appeal has merit; absent an appeal, we will be denied substantive rights.

6. Furthermore, we respectfully request permission to proceed on the original record without any obligation to reproduce any portion thereof. Frankly,

we can't afford it, and — since the relevant documents are voluminous and readily-available online — reproduction would be pointless.

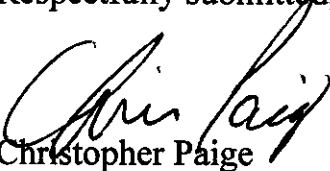
7. Please note that few issues have been litigated more thoroughly than our finances — the Bankruptcy Court spent five (5) years including a ten (10) day trial on the issue, so there's really nothing left to explore, and any further documentation/inquiry would be redundant and stupid.

8. Anything we have we need to combat my wife's cancer.

**WHEREFORE**, we respectfully request permission to proceed with our appeal *in forma paupers* and to proceed without reproducing any portion of the Record.

Dated: January 16, 2018

Respectfully submitted,



Christopher Paige  
Debtor-Defendant

*Pro Se*

75 78 177th St.

Fresh Meadows, NY 11366

718.591.6355



Michele Paige  
Debtor-Defendant

*Pro Se*

75 78 177th St.

Fresh Meadows, NY 11366

718.591.6355

### **CERTIFICATE OF SERVICE**

Under penalty of perjury, I hereby attest that I served a true and correct copy of the foregoing IFP - including any exhibits thereto - upon the person(s) identified below on the date provided below via first-class U.S. mail, postage prepaid:

John Goodchild, Esq.  
Morgan Lewis  
1701 Market St  
Philadelphia, PA 19103-2921

Dated: January 16, 2018

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Christopher Paige', is written above the printed name.

Christopher Paige  
Debtor-Defendant  
*Pro Se*  
75 78 177th St.  
Fresh Meadows, NY 11366  
718.591.6355